

research and testing, financial data, market analyses, and marketing and strategic planning documents. The parties marked such documents as either “Confidential” or “Highly Confidential” under the Court’s Protective Order.

3. Many of the parties’ confidential documents were attached to, or otherwise disclosed in filings with the Court. In accordance with the Joint Protective Order, such filings were under seal.

4. This matter has been resolved, and the Court entered a Final Judgment on April 5, 2011. [Doc.242]. Under Local Rule 79.4, unless the Court rules otherwise, all sealed documents will be deemed unsealed 60 days after the disposition of a case.

5. Public disclosure of the parties’ trade secret and other confidential and proprietary documents and information would significantly damage the parties’ businesses. Accordingly, Plaintiffs and Defendant jointly request that the Court permanently seal all filings that were previously filed under seal in this matter.

Dated: May 27, 2011

Respectfully submitted,

/s/ Michael C. Wilson

Michael C. Wilson
Texas State Bar No. 21704590
Jamil N. Alibhai
Texas State Bar No. 00793248
MUNCK CARTER, LLP
600 Banner Place
12770 Coit Road
Dallas, Texas 75251
Telephone: (972) 628-3600
Facsimile: (972) 628-3616

Of Counsel:

Stuart Pollack
DLA PIPER LLP
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 335-4964
Facsimile: (212) 884-8464

*Attorneys for Plaintiffs Galderma
Laboratories, L.P., Galderma S.A., and
Dermalogix Partners, Inc.*

/s/ Richard A. Sayles

Richard A. Sayles
Texas State Bar No. 17697500
Eve L. Henson
Texas State Bar No. 00791462
SAYLES WEBNER
A Professional Corporation
1201 Elm Street
4400 Renaissance Tower
Dallas, Texas 75270
Telephone: (214) 939-8700
Facsimile: (214) 939-8787

Of Counsel:

Edgar H. Haug
Porter F. Fleming
Angus Chen
FROMMER LAWRENCE & HAUG LLP
745 Fifth Avenue
New York, New York 10151
Telephone: (212) 588-0800
Facsimile: (212) 588-0500

*Attorneys for Defendant Paddock
Laboratories, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2011, a true and correct copy of the foregoing instrument was delivered upon all counsel of record via ECF.

/s/ Michael C. Wilson

Michael C. Wilson